IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ICONTROL NETWORKS, INC., a Delaware corporation, Plaintiff, v. ZONOFF, INC., a Delaware corporation, Defendant.	)	C.A. No.: 1:14-cv-01199-GMS **JURY TRIAL DEMANDED**

ICONTROL'S RESPONSE TO ZONOFF'S MOTION TO DISMISS AND FOR A MORE DEFINITE STATEMENT

Although Icontrol believes its Original Complaint (D.I. 1) sufficiently pleads its claims, in an effort to resolve this dispute without burdening the Court with motion practice, Icontrol filed a First Amended Complaint ("FAC") on November 18, 2014. *See* D.I. 15. The FAC addresses the alleged deficiencies identified by Zonoff. This FAC pleads further facts supporting Icontrol's indirect infringement claims and Zonoff's knowledge of the Patents-in-Suit. *See* D.I. 15 at ¶¶13-22, 26-28, 34-36, 42-44, 50-52, 58-60, and 66-68. Additionally, although Icontrol believes Zonoff's request for a more definite statement is without merit, Icontrol has now identified exemplary claims for each Patent-in-Suit that Icontrol believes Zonoff infringes.[1] *Id.* at ¶¶25, 33, 41, 49, 57, and 65.

Accordingly, Zonoff's Motion is moot.

[1] The recited claims are meant to be examples only, and not a conclusive statement on those claims Icontrol contends Zonoff infringes. Icontrol has not yet received Zonoff's core technical document production and has not served its initial infringement claim charts, as required by Paragraph 4 of the Court's "Default Standard for Discovery, Including Discovery of Electronically Stored Information" ("Default Standard")

Dated: November 21, 2014

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